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16	UNITED STATES DISTRICT COURT		
17	NORTHERN DISTRICT (	OF CALIFORNIA	
18	NORTHERN DISTRICT OF CALIFORNIA  SAN FRANCISCO DIVISION		
19	SAN FRANCISCO	DIVISION	
20	THE AMERICAN CIVIL LIBERTIES UNION OF NORTHERN CALIFORNIA, ASIAN LAW	Case No. 3:10-cv-03759-RS	
21	CAUCUS, SAN FRANCISCO BAY GUARDIAN	JOINT STIPULATION AND	
22	Plaintiffs,	<del>[PROPOSED]</del> ORDER REGARDING DOCUMENT PRODUCTION	
23	v.	SCHEDULE	
24		Judge: Hon. Laurel Beeler	
	FEDERAL BUREAU OF INVESTIGATION, DEPARTMENT OF JUSTICE,	Judge. Holl. Laufel Deelel	
25	Defendants.		
26	Detendants.		
27			
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	JOINT STIP & PROPOSED ORDER RE: DOCUMENT PRODUCTION SO CASE NO. 3:10-cv-03759-RS sf-3089937	CHEDULE	

1	WHEREAS in April 2011, Defendant agreed to produce all non-exempt documents		
2	responsive to Plaintiffs' March 9, 2010 and July 27, 2011 FOIA Requests (the "FOIA Requests"		
3	by December 13, 2011 [ECF No. 56];		
4	WHEREAS Defendant identified approximately 30,000 pages of additional responsive		
5	documents in the summer of 2011 [ECF No. 69];		
6	WHEREAS the parties met and conferred regarding the schedule for the production of		
7	documents and the method for discussing Defendant's claimed exemptions and conferred with		
8	Magistrate Judge Laurel Beeler on November 3, 2011 [ECF Nos. 72, 77], and agreed upon a		
9	schedule for the FBI's production of documents in response to the FOIA requests;		
10	WHEREAS, per the parties' agreement, as to responsive documents Defendant identified		
11	by May 26, 2011, in accordance with the Court's April 13, 2011 Order and Defendant's May 26,		
12	2011 Notice Regarding Production Schedule [ECF Nos. 56, 61, 63], the FBI produced all non-		
13	exempt documents by December 13, 2011; and		
14	WHEREAS, the parties agreed that as to responsive documents Defendant identified after		
15	May 26, 2011, Defendant shall process a minimum of 2,500 pages per month in response to the		
16	FOIA Requests and shall produce all non-exempt documents by June 30, 2012.		
17	IT IS HEREBY AGREED AND STIPULATED THAT:		
18	1. As to responsive documents Defendant identified after May 26, 2011, Defendant shall		
19	process a minimum of 2,500 pages per month in response to the FOIA Requests and		
20	shall produce all non-exempt documents by June 30, 2012.		
21	2. The parties will submit a confidential joint letter regarding the method for discussing		
22	Defendant's claimed exemptions and contact the courtroom deputy to set a further		
23	telephonic settlement conference, per the Court's January 4, 2012 Order		
24	(ECF No. 82).		
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1	Details I	
2	Dated: January 10, 2012	
3	Dry /s/Tamana Ulvi ah	By: /s/ Angela E. Kleine
4	By: <u>/s/Tamara Ulrich</u> TAMARA ULRICH	ANGELA E. KLEINE
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21		CAUCUS, AND THE SAN FRANCISCO BAY GUARDIAN
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Joint Stip & Proposed Order Re: Document Production Schedule Case No. 3:10-cv-03759-RS  $\,$  sf-3089937

1	[PROPOSED] ORDER
2	
3	Having reviewed the parties' joint stipulation, and for good cause shows
4	It is so ORDERED this $\frac{11}{2}$ day of January, 2012.
5	The Hanorable Lourel Region
6	The Honorable Laurel Beeler United States Magistrate Judge
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## ATTESTATION OF E-FILED SIGNATURE I, Angela E. Kleine, am the ECF User whose ID and Password are being used to file this Joint Stipulation and [Proposed] Order Regarding Document Production Schedule. In compliance with General Order 45, X.B., I hereby attest that Julia Harumi Mass, Nasrina Bargzie and Tamara Ulrich have concurred in this filing. Dated: January 10, 2012 By: /s/ Angela E. Kleine